

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**In Re:** ) **16-29627**  
 )  
**KELVIN L. BROWN,** ) **Chapter 13**  
 )  
**Debtor(s).** ) **Hon. Judge: HOLLIS**

**NOTICE OF MOTION**

*To the following persons or entities who have been served via electronic mail:*

U.S. Bankruptcy Trustee: [USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)

Trustee Glenn Stearns, Chapter 13 Trustee: [mylaner\\_j@lisle13.com](mailto:mylaner_j@lisle13.com)

*To the following persons or entities who have been served via U.S. Mail:*

See attached list.

Please take notice that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in their stead at **Joliet City Hall, 150 West Jefferson St., 2<sup>nd</sup> Floor, Joliet, IL 60432** and in the following courtroom (or any other place posted), and present the attached **Motion to Modify Plan**, at which time and place you may appear.

Judge: HOLLIS  
Court: 2<sup>nd</sup> Floor  
Date: October 18, 2019  
Time: 11:00 a.m.

**PROOF OF SERVICE**

A copy of this Notice of Motion and attachments were deposited at the United States Post Office, Wheeling, Illinois, 60090, with sufficient postage prepaid, by Michael R. Colter, II, or served electronically by the bankruptcy court, under oath and under all penalties of perjury.

DATE OF SERVICE: September 25, 2019

/s/ Michael R. Colter, II  
Michael R. Colter, II, A.R.D.C. #6304675

Attorney for the Debtor(s)  
**DAVID M. SIEGEL & ASSOCIATES**  
790 Chaddick Drive  
Wheeling, IL 60090  
847/520-8100

*To the following persons or entities who have been served via U.S. Mail:*

Kelvin Brown  
904 Gardner St.  
Joliet, IL 60433-2436

Commonwealth Edison  
Bankruptcy Department  
3 Lincoln Center  
Oak Brook Terrace, IL 60181-4204

Presence Health  
American InfoSource LP  
PO Box 248838  
Oklahoma City, OK 73124-8838

Nicor Gas  
P.O. Box 549  
Aurora, IL 60547

Amita Health Adventist  
Medical Center  
P.O. Box 9246  
Oak Brook, IL 60522

SFC Central Bankruptcy  
P.O. Box 1893  
Spartanburg, SC 29304

Sprint Corp.  
Attn: Bankruptcy Dept.  
P.O. Box 7949  
Overland Park, KS 66207-0949

Directv, LLC  
American InfoSource LP  
P.O. Box 5008  
Carol Stream, IL 60197-5008

**UNITED STATES BANKRUPTCY COURT  
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<b>In Re:</b>	)	<b>16-29627</b>
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<b>KELVIN L. BROWN,</b>	)	<b>Chapter 13</b>
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<b>Debtor(s).</b>	)	<b>Hon. Judge: HOLLIS</b>

**MOTION TO MODIFY CHAPTER 13**

NOW COMES the Debtor, **KELVIN L. BROWN**, by and through his attorneys, David M. Siegel & Associates, LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the U.S. District Court for the Northern District of Illinois Eastern Division.
- 2) On September 16, 2019, Debtor filed a petition for relief under Chapter 13 of Title 11 USC.
- 3) The plan was confirmed on December 9, 2016. The plan requires payments of \$125 per month with general unsecured creditors receiving no less than 10% of their allowed claims.
- 4) Debtor lost his job in March 2019. Debtor went back to work approximately a month or so after the job loss. He could not make payments to the trustee as he needed to bring his bills for necessary living expenses current.
- 5) Debtor seeks to modify his plan under 11 USC § 1329 to defer the current default in plan payments to the end of the plan.
- 6) Debtor does not seek this modification with any intent to defraud creditors. Debtor wants to complete the current plan.

WHEREFORE, the Debtor, **KELVIN L. BROWN**, prays that this Honorable Court enter an Order to Modify the Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II  
Michael R. Colter, II, A.R.D.C. #6304675

Attorney for the Debtor(s)  
David M. Siegel & Assoc., LLC  
790 Chaddick Drive  
Wheeling, Illinois 60090